

**STATE OF SOUTH CAROLINA**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**DOCKET NO. 2018-322-E**

In re: Application of Duke Energy  
Progress, LLC for Approval of  
Proposed Electric Transportation Pilot  
and An Accounting Order to Defer  
Capital and Operating Expenses

**PETITION TO INTERVENE**

Pursuant to R.103-825 of the South Carolina Code of Regulations, Sierra Club hereby petitions to intervene in the above-captioned docket. In support of this petition, Sierra Club states as follows:

1. On October 10, 2018, Duke Energy Progress, LLC (“DEP”) filed an application with the Public Service Commission of South Carolina (“Commission”) seeking approval of a proposed electric transportation pilot and an accounting order authorizing the deferral of costs associated with the pilot.
2. On November 28, 2018, Commission Standing Hearing Officer issued directives allowing certain intervening parties to file comments and responses to DEP’s application by December 10, 2018.
3. As the Commission has not yet established an intervention deadline for this proceeding, Sierra Club’s Petition to Intervene is timely filed.
4. Sierra Club is a national environmental organization whose mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the

earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. In furtherance of this mission, Sierra Club works to accelerate the transition from fossil fuels to clean energy solutions and advocates for state and federal policies and industry action to achieve this transition. Sierra Club has begun work to promote a widespread shift to plug-in electric vehicles and to ensure that the benefits of a twenty-first-century clean transportation system are enjoyed equitably.

5. Sierra Club has a long history of working to reduce air pollution and to promote clean energy sources in the Southeast. The Club has participated as intervenors in multiple proceedings before the Commission, including, most recently, docket nos. 2017-370-E, 2017-305-E, 2017-207-E, 2016-223-E, 2015-103-E, 2015-55-E, 2015-54-E, and 2015-53-E. Sierra Club members include customers of DEP who will be affected by decisions made in this proceeding regarding electric transportation program design, availability, and cost recovery.

6. Sierra Club and its members have direct and substantial interests that will be affected by the decisions made in this proceeding regarding the electric transportation pilot program design, availability, and cost recovery, and their interests cannot be adequately addressed by any other party. Sierra Club's position in this proceeding is to support well-designed electric transportation programs that will result in a shift to electric vehicle use, reduce pollution, and result in cleaner, safer, and healthier communities for all South Carolinians. Sierra Club's involvement in this proceeding will promote its members' interests as well as the broader public interest.

7. The address of the Sierra Club's principal office in South Carolina is 1314 Lincoln Street, Columbia, South Carolina 29201.

8. Pursuant to R.103-804(T) and R.103-805 of the South Carolina Code of Regulations, counsel representing Sierra Club in this proceeding is: Amelia Thompson & Amy Armstrong, South Carolina Environmental Law Project, Post Office Box 1380, Pawleys Island, SC 29585, Telephone: (843) 527-0078, Fax: (843) 527-0540, Email: amelia@scelp.org.

WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record in this proceeding and submit comments on DEP's application by December 10, 2018.

Respectfully submitted this 5th day of December, 2018.



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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I served the following persons with the foregoing  
Petition to Intervene by electronic mail and/or U.S. First Class Mail, addressed as follows:

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Amelia A. Thompson

Georgetown, SC  
December 5, 2018